

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION
AFFECTS YOUR CLAIM(S)**

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: :
Debtors. : (Jointly Administered)
:
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**NOTICE OF DEBTORS' NINETIETH OMNIBUS OBJECTION TO
CLAIMS AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**
(Late-Filed Claims)

PLEASE TAKE NOTICE that on September 17, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their ninetieth omnibus objection to expunge certain claims and motion requesting enforcement of Bar Date Orders¹ (the “**Ninetieth Omnibus Objection to Claims**”).

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Ninetieth Omnibus Objection to Claims.

and that a hearing (the “**Hearing**”) to consider the Ninetieth Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **October 26, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE
NINETIETH OMNIBUS OBJECTION TO CLAIMS AND MOTION REQUESTING
ENFORCEMENT OF BAR DATE ORDERS TO SEE IF THEIR NAME(S) AND/OR
CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT
“A” ANNEXED THERETO.**

PLEASE TAKE FURTHER NOTICE that any responses to the Ninetieth Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New

York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Tafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **October 19, 2010, at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Ninetieth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order

substantially in the form of the proposed order annexed to the Ninetieth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
September 17, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

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Attorneys for Debtors and
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x	
In re	: Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i>	: 09-50026 (REG)
Debtors.	: (Jointly Administered)
-----x	

**DEBTORS' NINETIETH OMNIBUS OBJECTION TO CLAIMS
AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**
(Late-Filed Claims)

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE
EXHIBIT ANNEXED TO THIS OBJECTION.**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) ("MLC") and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), respectfully represent:

Relief Requested

1. The Debtors file this ninetieth omnibus objection to certain claims and motion requesting enforcement of Bar Date Orders (as defined below) (the “**Ninetieth Omnibus Objection to Claims**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed against the Initial Debtors (as defined below) in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], this Court’s order deeming applicable the Procedures Order to the Realm/Encore Debtors (as defined below) (the “**Realm/Encore Order**”) [Docket No. 4841], this Court’s order approving the procedures relating to the filing of proofs of claim against the Initial Debtors (the “**Initial Debtors Bar Date Order**”) [Docket No. 4079], this Court’s order approving the procedures relating to the filing of proofs of claim against the Realm/Encore Debtors (the “**Realm/Encore Bar Date Order**”) [Docket No. 4586], and this Court’s supplemental order to the Initial Debtors Bar Date Order approving the procedures relating to the filing of certain proofs of claim relating to certain properties of the Debtors (the “**Property Bar Date Order**,” and collectively with the Initial Debtors Bar Date Order and the Realm/Encore Bar Date Order, the “**Bar Date Orders**”) [Docket No. 4681] seeking entry of an order disallowing and expunging the claims listed on **Exhibit “A”** annexed hereto.¹

¹ Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, www.motorsliquidation.com. A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

2. The Debtors have examined the proofs of claim identified on Exhibit "A" and have determined that the proofs of claim listed under the heading "*Claims to be Disallowed and Expunged*" (collectively, the "**Late-Filed Claims**") were filed after the Court-imposed deadlines for filing proofs of claim as set forth in the applicable Bar Date Orders. Because the Late-Filed Claims fail to comply with the Bar Date Orders, the Debtors request that consistent with the express terms of each of the Bar Date Orders, they be disallowed and expunged in their entirety. Further, the Debtors reserve all of their rights to object on any other basis to any Late-Filed Claims as to which the Court does not grant the relief requested herein.

Jurisdiction

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

4. On June 1, 2009, four of the Debtors (the "**Initial Debtors**")² commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the "**Realm/Encore Debtors**")³ commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

² The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

³ The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

5. On September 16, 2009, this Court entered the Initial Debtors Bar Date Order establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors' cases, including governmental units (the "**Initial Debtors Bar Date**"). On December 2, 2009, this Court entered the Realm/Encore Bar Date Order establishing February 1, 2010 (the "**Realm/Encore Bar Date**") as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010, the "**Realm/Encore Governmental Bar Date**"). On December 18, 2009, this Court entered the Property Bar Date Order establishing February 10, 2010 as the deadline for entities residing adjacent to or in the proximity of the material manufacturing properties of the Debtors as set forth in the Property Bar Date Notice (as defined below) (the "**Properties**") to file a proof of claim with respect to the Properties (the "**Property Bar Date**," and collectively with the Initial Debtors Bar Date, the Realm/Encore Bar Date, and the Realm/Encore Governmental Bar Date, the "**Bar Dates**").

6. In order to be timely-filed, proofs of claim must have been "actually received" on or before the applicable Bar Date. (Initial Debtors Bar Date Ord. at 3 (emphasis in original); Realm/Encore Bar Date Ord. at 3 (emphasis in original); Property Bar Date Ord. at 2 (emphasis in original).) The Bar Date Orders also expressly provide that any holder of a claim against the Debtors who is required, but fails, to file a proof of such claim in accordance with the applicable Bar Date Order on or before the applicable Bar Date shall forever be barred, estopped, and enjoined from asserting such claim against each of the Debtors and their respective estates (or filing a Proof of Claim with respect thereto) (Initial Debtors Bar Date Ord. at 5;

Realm/Encore Bar Date Ord. at 5; Property Bar Date Ord. at 4.) Copies of the Bar Date Orders were made publicly available at www.motorsliquidationdocket.com.

7. Each of the claimants received actual notice of the Initial Debtors Bar Date Order (the “**Initial Debtors Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “B”**), the Realm/Encore Bar Date Order (the “**Realm/Encore Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “C”**, and the “**Realm/Encore Local Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “D”**), and/or the Property Bar Date Order (the “**Property Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “E”**; and collectively with the Initial Debtors Bar Date Notice, the Realm/Encore Bar Date Notice, and the Realm/Encore Local Bar Date Notice, the “**Bar Date Notices**”), as applicable, via mail. The Initial Debtors Bar Date Notice was also published in the *Financial Times*, *The Wall Street Journal* (Global Edition—North America, Europe, and Asia), *The New York Times* (National), *USA Today* (Monday through Thursday, National), *Detroit Free Press/Detroit News*, *Le Journal de Montreal* (French), *Montreal Gazette* (English), *The Globe and Mail* (National), and *The National Post*. The Realm/Encore Bar Date Notice was also published in *USA Today* (National Edition) and *The New York Times* (National Edition). The Realm/Encore Local Bar Date Notice was also published in the newspapers set forth in the Realm/Encore Local Bar Date Notice. The Property Bar Date Notice was also published in the newspapers set forth in the Property Bar Date Notice.

8. Reflecting the Bar Date Orders’ severe consequences regarding missing the deadline for filing proofs of claim, each of the Bar Date Notices clearly and unambiguously notified claimants that proofs of claim against the Debtors must be received on or before the applicable Bar Date (Initial Debtors Bar Date Notice at 3; Realm/Encore Bar Date Notice at 3;

Realm/Encore Local Bar Date Notice at 3; Property Bar Date Notice at 3.) and prominently stated in bold-face type that any creditor who fails to file a proof of claim on or before the applicable Bar Date will be forever barred from asserting the claim or filing a proof of claim with respect to the claim. (Initial Debtors Bar Date Notice at 4; Realm/Encore Bar Date Notice at 4; Realm/Encore Local Bar Date Notice at 3; Property Bar Date Notice at 4.) While a notice period of only 35 days of a bar date is recommended by the Second Amended Procedural Guidelines for Filing Requests for Bar Date Orders in the United States Bankruptcy Court for the Southern District of New York, in this case, the Debtors provided creditors 65 days notice of the Initial Debtors Bar Date, 51 days notice of the Realm/Encore Bar Date, 125 days notice of the Realm/Encore Governmental Bar Date, and 44 days notice of the Property Bar Date.

9. On October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order. On January 19, 2010, this Court also entered the Realm/Encore Order, which deems as applicable the Procedures Order to the Realm/Encore Debtors.

The Relief Requested Should Be Approved by the Court

10. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

11. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

Moreover, Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “proof of such claim is not timely filed.” 11 U.S.C. § 502(b)(1).

12. The United States Supreme Court of the United States has established a standard for allowing a late claim, requiring a showing of excusable neglect. *Pioneer Inv. Servs. Co. v. Brunswick Assocs.*, 507 U.S. 380 (1993). The *Pioneer* Court established five factors in consideration of what constitutes excusable neglect: (1) the degree of prejudice to the debtors; (2) the length of the delay and its potential impact on judicial proceedings; (3) the reason for the delay, including whether it was within the reasonable control of the claimant; (4) whether the claimant acted in good faith; and (5) if a claimant had counsel, whether a claimant should be penalized for their counsel’s mistake or neglect. *Id.* at 385, 387. In other words, simple inadvertence is not sufficient grounds. Here, the Debtors have already filed their chapter 11 plan of liquidation and none of the claimants have sought leave of the Court to allow their late-filed claim. It would be severely prejudicial to other claimants and these judicial proceedings to now have to reserve distributions while the standards of excusable neglect are adjudicated as to each and every one of the hundreds of late-filing claimants.

13. In applying *Pioneer*, the Second Circuit has adopted what can be characterized as a hard line test for determining whether a party’s neglect is excusable. *In re Enron Corp.*, 419 F.3d 115, 122-23 (2d Cir. 2005). The Second Circuit focuses on the “reason for the delay” and cautions that rarely will the equities favor a claimant who fails to follow a

clear court rule. *Id.* at 123; *Redhead v. Conf. of Seventh-Day Adventists*, 360 Fed. Appx. 232, 235 (2d Cir. 2010) (same).

14. “Bar dates are ‘critically important to the administration of a successful chapter 11 case.’” (Memorandum Decision Denying Motions for Leave to File Late Claims, No. 08-13555 (JMP) [Docket No. 9150], *In re Lehman Bros. Holdings, Inc.*, Case No. 08-13555 (JMP), 2010 WL 2000326 at *2 (Bankr. S.D.N.Y. May 20, 2010) (quoting *In re Musicland Holding Corp.*, 356 B.R. 603, 607 (Bankr. S.D.N.Y. 2006)).) A bar date is more than a “procedural gauntlet” and functions as “an integral part of the reorganization process.” *In re Hooker Invs., Inc.*, 937 F.2d 833, 840 (2d Cir. 1991). A bar date enables debtors to determine with reasonable promptness, efficiency and finality what claims will be made against their estates—a determination without which they cannot effectively reorganize. *In re Keene Corp.*, 188 B.R. 903, 907 (Bankr. S.D.N.Y. 1995). Accordingly, bar dates are strictly enforced in the Second Circuit. *See id.*; *In re Lehman Bros. Holdings, Inc.*, 2010 WL 2000326 at *2; *In re Musicland Holding Corp.*, 356 B.R. at 607 (“The bar date is akin to a statute of limitations, and must be strictly enforced.”).

15. The Bar Date Orders specifically require proofs of claim to be **actually received** on or before the applicable Bar Dates. (Initial Debtors Bar Date Ord. at 3; Realm/Encore Bar Date Ord. at 3; Property Bar Date Ord. at 2.) Claimants were provided notice of the Bar Date Orders, including the deadline to file proofs of claim and a clear warning that failure to comply with the applicable Bar Date would result in their claims being barred. (*See* Initial Debtors Bar Date Ord. at 5; Realm/Encore Bar Date Ord. at 5; Property Bar Date Ord. at 4.) Nevertheless, the holders of the Late-Filed Claims filed their proofs of claim subsequent to the applicable Bar Date.

16. Because the Late-Filed Claims fail to comply with the Bar Date Orders and are thus untimely, the Debtors request that the Court enforce its prior Bar Date Orders and disallow and expunge in their entirety the Late-Filed Claims listed on Exhibit "A."

Notice

17. Notice of this Ninetieth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Fourth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

18. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York
September 17, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ABRAMS, ELIZABETH 206 SWAN ST BUFFALO, NY 14204	69191	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ADAMS, WILLIE 12420 ALAMANCE WAY UPPER MARLBORO, MD 20772	68978	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ALBERT TULLY 5464 NORTHWAY RD PLEASANTON, CA 94566	68217	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$39,270.00 (U) \$39,270.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ALICE M STORY 100 SYCAMORE PLACE ATHENS, AL 35611	69543	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/18/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
AMERISURE MUTUAL INSURANCE CO 26777 HALSTED ROAD SUITE 300 FARMINGTON HILLS, MI 48331	70048	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,230.58 (U) \$3,230.58 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 2/20/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ANDY WIPF 13452 400TH AVE GROTON, SD 57445	70079	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,000.00 (U) \$4,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 3/2/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ARNOLD, GWENDOLYN A PO BOX 26243 DAYTON, OH 45426	69402	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U) \$5,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/14/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ARNOLD, TYRONE V PO BOX 26243 DAYTON, OH 45426	69403	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,600.00 (U) \$9,600.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/14/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ARONSON FURNITURE COMPANY ACCT OF MICHELE D BURGE 140 S DEARBORN ST STE 420 CHICAGO, IL 60603	69224	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$153.89 (U) \$153.89 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: N/A
Official Claim Date: 12/3/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ATTALLAH BANKS 2450 WALNUT BOTTOM RD YORK, PA 17408	69264	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: 12/7/2009
Official Claim Date: 12/9/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BARRY HARRELL 8109 LAKESIDE CT 1-13 FT WAYNE, IN 46816	69924	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,300.00 (U) \$2,300.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/30/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

BECK MARGARET E 3554 CALERA DRIVE NEW PORT RICHEY, FL 34652	68188	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$14,300.00 (U) \$14,300.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BENNETT, PAUL R 3287 RIPPLE WAY WHITE LAKE, MI 48383	69081	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$65,000.00 (U) \$65,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

BLACK, JASON 807 CAMILLA IRVING, TX 75039	70110	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 3/9/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BLANCHE KRUEGER 238 S 64TH ST MILWAUKEE, WI 53214	69225	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/3/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

BOSSERT, RONALD R 68 BROOKRIDGE LN PAWLEYS ISLAND, SC 29585	68640	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$39,000.00 (U) \$39,000.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/2/2009
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BRINKS INC 1120 VENICE BLVD LOS ANGELES, CA 90015	69033	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,193.13 (U) \$1,193.13 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/6/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

CHICAGO SCENIC STUDIOS INC 1315 N NORTH BRANCH ST CHICAGO, IL 60642	69272	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,775.00 (U) \$8,775.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/9/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
COLORADO CASUALTY	69740		\$0.00 (S)		
FERBER & TAYLOR			\$0.00 (A)		
5611 FALLBROOK AVE			\$0.00 (P)		
WOODLAND HILLS, CA 91367			\$48,742.43 (U)		
			\$48,742.43 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/22/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

COOPER, LYNNETTE S	69108			Late-Filed Claim	Pgs. 1-5
1967 N HWY 61					
WENTZVILLE, MO 63385					

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/3/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
COX, PAULA 1511 WATER ST PO BOX 54 ALDEN, IA 50006	69995	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,000.00 (U) \$3,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 2/5/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

CURTIS GRIFFIN 4220 HIGHWAY 29 NEW AUGUSTA, MS 39462	70077	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,200.00 (U) \$6,200.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 3/1/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DALY, PAMELA 3831 HUTSON AVE NASHVILLE, TN 37216	69741	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,295.00 (U) \$3,295.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 1/11/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69068	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$25,000.00 (U) \$25,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69070	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$54,751.00 (U) \$54,751.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52080	69072	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$38,943.00 (U) \$38,943.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DANIEL R CARRETTA CHARLES SCHWAB & CO INC CUST IRA ROLLOVER 2480 CLEAR MARSH RD JOHNS ISLAND, SC 29455	69675	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$666.81 (U) \$666.81 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/31/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DONNA TOCARCHICK 9605 DEER TRL HASLETT, MI 48840	68342	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$74,194.00 (U) \$74,194.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/3/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DR REINHARD GIETZELT MARIENHOEHER WEG 11 12105 BERLIN GERMANY , GERMANY	69448	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,000.00 (U) \$7,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/16/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
EDWARDS, ULESS C 5213 STRIKE THE GOLD LN WESLEY CHAPEL, FL 33544	69062	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/3/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ERNEST ROMERO 9927 WALNUT DR #201 KANSAS CITY, MO 64114	69238	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$27,000.00 (U) \$27,000.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/1/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ERNST R BERENDS 825 NORMA DRIVE PISMO BEACH, CA 93449	69277	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/9/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

FAY, TYLER 221 W LINCOLN ST WHITE HALL, IL 62092	69019	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,500.00 (U) \$2,500.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FRANK KUHR 3162 STOLZENFELD AVE WARREN, MI 48091	68689	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,555.00 (U) \$6,555.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

FRANK KUHR 3162 STOLZENFELD AVE WARREN, MI 48091	68690	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$40,000.00 (U) \$40,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FREDERICK GRIFFITH 6920 STATE ROUTE 56 E CIRCLEVILLE, OH 43113	68230	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

GARY O'SHIELDS 4956 GLENN DR NEW PORT RICHEY, FL 34652	68039	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$53,146.00 (U) \$53,146.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/2/2009
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
GEICO INSURANCE ONE GEICO BLVD FREDERICKSBURG, VA 22412	69811	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,979.11 (U) \$6,979.11 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/20/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

GONZALEZ CATALINA 8401 N 67TH AVE GLENDALE, AZ 85302	69533	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,000.00 (U) \$6,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/18/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
GRANGE INSURANCE PO BOX 1218 COLUMBUS, OH 43216	70153	Remediation And Liability Management Company, Inc.	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,627.54 (U) \$2,627.54 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 2/1/2010
 Postmark Date: N/A
 Official Claim Date: 3/23/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

HAWKINS LINDA 6892 PIN OAK DR BOSTON, NY 14025	68799	Motors Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HURD JR, ZEBEDEE 3522 PROVIDENCE ST FLINT, MI 48503	69757	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,481.00 (U) \$9,481.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/11/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

IRA FBO ANN H FINK PERSHING LLC AS CUSTODIAN 607 MELVIN RD TELFORD, PA 18969	69109	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,263.75 (U) \$6,263.75 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/3/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JAMES PRESTON C/O SMOCKUM ZARNETT PERCIVAL LLP ATTN WILLIAM JESSEAU 800-120 ADELAIDE ST W TORONTO, ONTARIO M5H 1T1	68503	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
,			\$25,000.00 (U)		
CANADA			\$25,000.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

JONES, PEARLY M 168 BRANCH ST LOCKPORT, NY 14094	69398	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$45,000.00 (U)		
			\$45,000.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/14/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JORDAN, ELONDA 227 HUBBARD CIR ANNISTON, AL 36206	69352	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$31,227.80 (U) \$31,227.80 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/9/2009
 Official Claim Date: 12/11/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

KLINETOBE, WARREN & SHIRLEY C/O THE HARTFORD ATTN VALERIE CAMBRIDGE PO BOX 14272 LEXINGTON, KY 40512	69925	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,133.50 (U) \$8,133.50 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/30/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
KNIGHT, HENRY E 1412 DEVONSHIRE COUNTY DR WENTZVILLE, MO 63385	67991	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: 12/3/2009
Official Claim Date: 12/7/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

LEVERICH EDWARD 5022 HILLTOP DR SHAWNEE MISSION, KS 66226	69607	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: N/A
Official Claim Date: 12/22/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LEVERICH, EDWARD 5022 HILLTOP DR SHAWNEE MISSION, KS 66226	69410	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/14/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

LEXISNEXIS A DIV OF REED ELSEVIER INC ATTN BETH FARNHAM 9443 SPRINGBORO PIKE MIAMISBURG, OH 45342	69718	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,041.42 (U) \$9,041.42 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/31/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MARGARET & KEITH BRIEN C/O SMOCKUM ZARNETT PERCIVAL LLP ATTN WILLIAM JESSEAU 800-120 ADELAIDE ST W TORONTO ONTARIO M5H1T1	68504	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
,			\$20,000.00 (U)		
CANADA			\$20,000.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MARILYN TEETER 18410 LISTER AVE EAST POINTE, MI 48021	68358	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$67,952.00 (U)		
			\$67,952.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/3/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MAXIMUM HOME HEALTH	69837	MLCS, LLC	\$0.00 (S)	Late-Filed Claim	Pgs. 1-5
JULIAN RODRIGUEZ JR & ASSOCIATES			\$0.00 (A)		
10113 N 10TH ST SUITE C					
MCALLEN, TX 78504			\$0.00 (P)		
			\$19,141.84 (U)		
			\$19,141.84 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/25/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MCCARY, RONALD L 14803 GREENVIEW RD DETROIT, MI 48223	70265	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 4/29/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MCCOY, RUTH V 188 MIDLAND PKWY APT 413 SUMMERTON, SC 29485	69239	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/3/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MELISSA DAVISON 2001 S SHERWOOD FOREST BLVD #225 BATON ROUGE, LA 70816	65971	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,650.00 (U) \$3,650.00 (T)	Unliquidated	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MERRICK INDUSTRIES INC ATTN PETRA HILL 10 ARTHUR DRIVE LYNN HAVEN, FL 32444	70226	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,969.94 (U) \$2,969.94 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 4/13/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MESAROS, MICHAEL A 15 NANTUCKET ROW ROCKY RIVER, OH 44116	70196	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$811.41 (U) \$811.41 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 4/3/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MICHAEL, RICHARD A 1857 SUNRISE DRIVE GREENBUSH, MI 48738	68963	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$26,694.00 (U) \$26,694.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MICHIGAN AIR PRODUCTS ATTN STEPHEN J MOLLISON PO BOX 1155 TROY, MI 48099	70270	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,640.00 (U) \$10,640.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 5/4/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MICHIGAN PALLET INC PO BOX 97 SAINT CHARLES, MI 48655	70024	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$13,928.20 (U) \$13,928.20 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 2/11/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MONTGOMERY CNTY SAN ENG DEP OH ATTN LEGAL OFFICER/ BANKRUPTCY DEPT 1850 SPAULDING RD PO BOX 817601 DAYTON, OH 45481	68052	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,838.33 (U) \$15,838.33 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MONTGOMERY COUNTY SANITARY ENGINEERING 1850 SPAULDING RD DAYTON, OH 45432	68051	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$13.19 (U) \$13.19 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/2/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

NANCY CARRETTA TTEE NANCY V CARRETTA INTERVIVOS TRUST U/A DTD 08/05/96 2480 CLEAR MARSH ROAD JOHNS ISLAND, SC 29455	69676	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$666.97 (U) \$666.97 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/31/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
NEW PENN MOTOR EXPRESS PO BOX 630 LEBANON, PA 17042	69889	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,446.51 (U) \$1,446.51 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/26/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

NEW YORK STATE THRUWAY AUTHORITY 200 SOUTHERN BLVD PO BOX 189 ALBANY, NY 12201	67801	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$653.65 (U) \$653.65 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/1/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PATSY BARKER 10408 LA MIRAGE CT TAMPA, FL 33615	69178	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$57,000.00 (U) \$57,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PATSY BARKER 10408 LA MIRAGE CT TAMPA, FL 33615	69179	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PATSY BARKER 10408 LA MIRAGE CT TAMPA, FL 33615	69180	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$42,000.00 (U) \$42,000.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PATSY BARKER 10408 LA MIRAGE CT TAMPA, FL 33615	69182	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$34,320.00 (U) \$34,320.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PATSY BARKER 10408 LA MIRAGE CT TAMPA, FL 33615	69183	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$39,952.00 (U) \$39,952.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PEARLY JONES 168 BRANCH ST LOCKPORT, NY 14094	69399	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$45,000.00 (U) \$45,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/14/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PEIFFER, CAROLYN 27206 ISANTI ST NE ISANTI, MN 55040	70069	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,900.00 (U) \$5,900.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 2/26/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PITTMAN, ELOISE 404 GLEN IRIS DR NE ATLANTA, GA 30308	70142	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 3/20/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
QI XIN WU 4820 LISTRA RD ROCKVILLE, MD 20853	70246	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,500.00 (U) \$8,500.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 4/22/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

RANDALL L STEENBOCK 1288 APRIL LN GREEN BAY, WI 54304	69303	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,000.00 (U) \$1,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/7/2009
 Official Claim Date: 12/10/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
RICHARD J MCINNIS 5517 HAMMERMILL DR HARRISBURG, NC 28075	68417	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/3/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ROBERT GEITNER 5900 STATE HIGHWAY 57 STURGEON BAY, WI 54235	70120	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,500.00 (U) \$2,500.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 3/13/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
RUSAW, MICHAEL W 9330 SE 173RD HYACINTH ST THE VILLAGES, FL 32162	69423	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$80,984.00 (U) \$80,984.00 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/14/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SAARGUMMI DEUTSCHLAND GMBH EISENBAHNSTR 24 WADERN SL 66687 GERMANY , GERMANY	70058	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,438.20 (U) \$7,438.20 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 2/11/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SAIA MOTOR FREIGHT 3301 ANDOVER ST JEFFERSON, LA 70121	69316	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,091.73 (U) \$2,091.73 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/7/2009
 Official Claim Date: 12/10/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SANDERS, WANDA 610 CLAY ST MARION, AL 36756	69586	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,375.00 (U) \$15,375.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/21/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SCHAEFER, ANNA M 4220 COLFAX AVE S MINNEAPOLIS, MN 55409	69052	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SEMANICK, WALTER M 2497 INDIGO DR CLEARWATER, FL 33763	69190	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,606.00 (U) \$1,606.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/4/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SHEILA A LOY TTEE SHEILA A LOY 2001 LIV TRUST U/A DTD 08/30/01 275 W EMERSON ST UPLAND, CA 91784	69562	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$18,921.23 (U) \$18,921.23 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/21/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

STANLEY CHEVROLET-CELINA 1413 S PRESTON RD CELINA, TX 75009	67823	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/1/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SULLIVAN, ROSEMARY 3701 YAKOBI LN NAPLES, FL 34119	69209	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/5/2009
 Official Claim Date: 12/8/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

TEAGUE, TIMOTHY W 2500 ACORN CT LANCASTER, OH 43130	65476	Motor Liquidation Company	Late-Filed Claim	Pgs. 1-5
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Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
TOLBERT, EILEEN 2395 HARBOR BLVD APT 203A PORT CHARLOTTE, FL 33952	69237	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/4/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

TOMPACH, FAYE M (DECEASED) 5837 MITCHELL CANYON CT CLAYTON, CA 94517	69451	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$67,320.00 (U) \$67,320.00 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/16/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ULRICH, MARTIN T 13103 KINGSTON AVE HUNTINGTON WOODS, MI 48070	68542	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/3/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WEISS, BRYAN PATRICK MULCAHY 201 E MAIN ST STE C NORTHVILLE, MI 48167	68928	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$21,181.59 (U)		
			\$21,181.59 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/3/2009
 Official Claim Date: 12/7/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
WELLMEYER BLANCHE E	67956	Motor Liquidation Company	\$0.00 (S)	Late-Filed Claim	Pgs. 1-5
WELLMEYER JONATHAN S			\$0.00 (A)		
4173 CANAL ST					
NEW ORLEANS, LA 70119			\$0.00 (P)		
			\$25,854.17 (U)		
			\$25,854.17 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: N/A
Official Claim Date: 12/1/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WELLMEYER BLANCHE E	67957	Motor Liquidation Company	\$0.00 (S)	Late-Filed Claim	Pgs. 1-5
SUGG TALIA B			\$0.00 (A)		
BERGER & ASSOCS ALLEN					
4173 CANAL ST			\$0.00 (P)		
NEW ORLEANS, LA 70119			\$25,854.17 (U)		
			\$25,854.17 (T)		

Additional Claim Information

Applicable Bar Date: 11/30/2009
Postmark Date: N/A
Official Claim Date: 12/1/2009
Docket Number of Affidavit of Service: 4238
Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
WELLMEYER BLANCHE E 4173 CANAL ST NEW ORLEANS, LA 70119	67959	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$25,854.17 (U) \$25,854.17 (T)	Late-Filed Claim	Pgs. 1-5

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 12/1/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WILSON, VONELL 22597 MOORESVILLE RD ATHENS, AL 35613	69786	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5
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Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: N/A
 Official Claim Date: 1/15/2010
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
YOUNG, NORA J 3563 TOWNLINE RD BIRCH RUN, MI 48415	67665	Motor Liquidation Company		Late-Filed Claim	Pgs. 1-5

Unliquidated

Additional Claim Information

Applicable Bar Date: 11/30/2009
 Postmark Date: 12/1/2009
 Official Claim Date: 12/1/2009
 Docket Number of Affidavit of Service: 4238
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

CLAIMS TO BE DISALLOWED AND EXPUNGED

98	\$0.00 (S)
	\$0.00 (A)
	\$0.00 (P)
	\$1,635,628.26 (U)
	\$1,635,628.26 (T)

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

EXHIBIT B

Initial Debtors Bar Date Notice

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X-----
In re : **Chapter 11 Case No.**
: **09-50026 (REG)**
MOTORS LIQUIDATION COMPANY :
f/k/a GENERAL MOTORS CORPORATION, :
et al., :
Debtors. : **(Jointly Administered)**
:-----X-----

**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM
(INCLUDING CLAIMS UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Motors Liquidation Company (f/k/a General Motors Corporation)	09-50026	38-0572515	General Motors Corporation GMC Truck Division NAO Fleet Operations GM Corporation GM Corporation-GM Auction Department National Car Rental National Car Sales Automotive Market Research
MLCS, LLC (f/k/a Saturn, LLC)	09-50027	38-2577506	Saturn, LLC Saturn Corporation Saturn Motor Car Corporation GM Saturn Corporation Saturn Corporation of Delaware
MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation)	09-50028	38-2755764	Saturn Distribution Corporation
MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.)	09-13558	20-1426707	Chevrolet-Saturn of Harlem, Inc. CKS of Harlem

PLEASE TAKE NOTICE THAT, on September 16, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”), having jurisdiction over the chapter 11 cases of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) entered an order (the “**Bar Date Order**”) establishing (i) **November 30, 2009, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims, including a claim under section 503(b)(9) of the Bankruptcy Code, as described more fully below (a “**503(b)(9) Claim**”), against any of the Debtors (the “**General Bar Date**”); and (ii) **November 30, 2009, at 5:00 p.m. (Eastern Time)** as the last date and time for each governmental unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on prepetition claims against any of the Debtors (the “**Governmental Bar Date**” and, together with the General Bar Date, the “**Bar Dates**”).

The Bar Date Order, the Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the Debtors (other than those set forth below as being specifically excluded) that arose prior to **June 1, 2009**, the date on which the Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

If you have any questions relating to this Notice, please feel free to contact AlixPartners at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the Debtors or to share in any of the Debtors' estates if you have a claim that arose prior to **June 1, 2009**, including a 503(b)(9) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the Debtors that arose before **June 1, 2009** may give rise to claims against the Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **June 1, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims (as defined in Section 2(d) below).

2. WHO NEED NOT FILE A PROOF OF CLAIM

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schedules (as defined below) and (i) is **not** described in the Schedules as "disputed," "contingent," or "unliquidated," (ii) you do **not** dispute the amount or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific Debtor against which the claim is listed on the Schedules;
- (b) Your claim has been paid in full;
- (c) You hold an interest in any of the Debtors, which interest is based exclusively upon the ownership of common or preferred stock, membership interests, partnership interests, or warrants or rights to purchase, sell or subscribe to such a security or interest; **provided, however,** that interest holders who wish to assert claims (as opposed to ownership interests) against any of the Debtors that arise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issuance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies;
- (d) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; **provided, however, 503(b)(9) Claims are subject to the General Bar Date as provided above.** Section 503(b)(9) provides in part: "...there shall be allowed administrative expenses...including...(9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business." **Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the General Bar Date;**
- (e) You hold a claim that has been allowed by an order of the Court entered on or before the applicable Bar Date;
- (f) You hold a claim against any of the Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (g) You are a Debtor in these cases having a claim against another Debtor;
- (h) You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any Debtor as of the Bar Date;

- (i) You hold a claim for which you have already properly filed a Proof of Claim against any of the Debtors with the Clerk of the Court or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10; or
- (j) You hold a claim that is limited exclusively to the repayment of principal, interest and other fees and expenses on or under any agreements (a "**Debt Claim**") governing any debt security issued by any of the Debtors pursuant to an indenture (together, the "**Debt Instruments**") if the indenture trustee or similar fiduciary under the applicable indenture or fiscal and paying agency agreement files a Proof of Claim against the applicable Debtor, on or before the Bar Date, on account of all Debt Claims against such Debtor under the applicable Debt Instruments, provided, however, that any holder of a Debt Claim wishing to assert a claim arising out of or relating to a Debt Instrument, other than a Debt Claim, shall be required to file a Proof of Claim with respect to such claim on or before the Bar Date, unless another exception identified herein applies. Debt Instruments include those agreements listed at the end of this Notice.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable Bar Date, and (ii) the date which is **thirty days** following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of June 1, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable Bar Date unless an exception identified above applies.

4. WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be actually received on or before the applicable Bar Date at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
P.O. Box 9386
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY
One Bowling Green
Room 534
New York, New York 10004

Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before the applicable Bar Date. Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

5. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR’S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at www.uscourts.gov/bkforms/ or www.motorsliquidation.com.

YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against each of the Debtors, will be forever barred – that is, forbidden – from asserting the claim against each of the Debtors and their respective estates (or filing a Proof of Claim with respect to the claim), and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, participate in any distribution in any of the Debtors’ chapter 11 cases on account of the claim, or receive further notices with respect to any of the Debtors’ chapter 11 cases.

7. THE DEBTORS’ SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF

You may be listed as the holder of a claim against one or more of the Debtors in the Debtors’ Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the “**Schedules**”). If you rely on the Debtors’ Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the Debtors’ Schedules, and if you do not dispute that your claim is only against the specified Debtor, and if your claim is not described as “disputed”, “contingent”, or “unliquidated”, you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court’s electronic docket for the Debtors’ chapter 11 cases, which is posted on the Internet at www.motorsliquidation.com and www.nysb.uscourts.gov (a PACER login and password are required and can be obtained through the PACER Service Center at www.pacerpsc.uscourts.gov). Copies of the Schedules may also be examined by interested parties between the hours of 9:00 a.m. and 4:30 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York 10004. Copies of the Debtors’ Schedules may also be obtained by written request to the Debtors’ claims agent at the address and telephone number set forth below:

The Garden City Group, Inc.
Attn: Motors Liquidation Company
P.O. Box 9386
Dublin, Ohio 43017-4286
1-703-286-6401

In the event that the Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, or (d) add a claim that was not listed on the Schedules, the Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable Bar Date and (b) the date that is **thirty days** after the Debtors provide notice of the amendment.

A holder of a possible claim against the Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.

DATED: September 16, 2009
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

Certain Debt Instruments

	Debt Instrument	CUSIP, ISIN, or Swiss Security Numbers
1	Indenture, dated as of Nov. 15, 1990, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AN5, 370442AJ4, 370442AR6, 37045EAG3, 37045EAST7
2	Indenture, dated as of Dec. 7, 1995, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AT2, 370442AU9, 370442AV7, 370442AZ8, 370442BB0, 370442816, 370442774, 370442766, 370442758, 370442741, 370442733, 370442725, 370442BQ7, 370442BT1, 370442717, 370442BW4, 370442BS3, 370442121, 370442691
3	Trust Indenture, dated as of July 1, 1995, between Michigan Strategic Fund and Dai-Ichi Kangyo Trust Company of New York (\$58,800,000 Multi-Modal Interchangeable Rate Pollution Control Refunding Revenue Bonds)	CUSIP No. 594693AQ6
4	Indenture of Trust, dated as of July 1, 1994, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$12,500,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AA2
5	Indenture of Trust, dated as of July 1, 1999, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$10,000,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AB0
6	Trust Indenture, dated as of Dec. 1, 2002, among City of Fort Wayne, Indiana, JPMorgan Chase Bank and Bank One Trust Company, N.A., (\$31,000,000 Pollution Control Revenue Refunding Bonds)	CUSIP No. 455329AB8
7	Trust Indenture, dated as of Mar. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$20,040,000 State of Ohio Pollution Control Refunding Revenue Bonds)	CUSIP No. 667596AU2
8	Indenture of Trust, dated as of Dec. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$46,000,000 State of Ohio Solid Waste Revenue Bonds)	CUSIP No. 67759ABC2
9	Trust Indenture, dated as of Apr. 1, 1984, among City of Indianapolis, Indiana, Bankers Trust Company and The Indiana National Bank (\$1,400,000 Pollution Control Revenue Bonds)	CUSIP No. 455329AB8

10	Fiscal and Paying Agency Agreement, dated as of July 3, 2003, between GM, Deutsche Bank AG London, as fiscal agent and paying agent, and Banque Générale du Luxembourg S.A., as paying agent	ISIN Nos. XS0171942757, XS0171943649
11	Fiscal and Paying Agency Agreement, dated as of July 10, 2003, between GM Nova Scotia Finance Company, GM, as guarantor, Deutsche Bank Luxembourg S.A., as fiscal agent and paying agent, and Banque Générale du Luxembourg S.A., as paying agent	ISIN Nos. XS0171922643, XS0171908063.
12	Bond Purchase and Paying Agency Agreement dated May 28, 1986 between GM and Credit Suisse	Swiss Security No. 876 926

EXHIBIT C

Realm/Encore Bar Date Notice

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X-----	
In re	: Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, et al.,	: 09-50026 (REG)
f/k/a General Motors Corp., et al.	: :
Debtors.	: (Jointly Administered)
-----X-----	
In re	: Chapter 11 Case No.
REMEDIATION AND LIABILITY	: :
MANAGEMENT COMPANY, INC.,	: 09- 50029 (REG)
Debtor.	: :
-----X-----	
In re	: Chapter 11 Case No.
ENVIRONMENTAL CORPORATE	: :
REMEDIATION COMPANY, INC.,	: 09-50030 (REG)
Debtor.	: :
-----X-----	

**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM
(INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Remediation and Liability Management Company, Inc. (subsidiary of General Motors Corporation)	09-50029 (REG)	38-2529430	Uptown Land Development Corporation
Environmental Corporate Remediation Company, Inc. (subsidiary of General Motors Corporation)	09-50030 (REG)	41-1650789	GM National Hawaii, Inc. NCRS Hawaii, Inc.

PLEASE TAKE NOTICE THAT, on December 2, 2009, the United States Bankruptcy Court for the Southern District of New York (the “Court”) having jurisdiction over the chapter 11 cases of Remediation and Liability Management Company, Inc. and Environmental Corporate Remediation Company, Inc., as debtors in possession (each subsidiaries of **General Motors Corporation**) (collectively, the “**REALM/ENCORE Debtors**”) entered an order (the “**REALM/ENCORE Bar Date Order**”) establishing (i) **February 1, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims including a claim under section 503(b)(9) of the Bankruptcy Code (as described more fully below (a “**503(b)(9) Claim**”)), against any of the

REALM/ENCORE Debtors (the “**REALM/ENCORE General Bar Date**”); and (ii) **April 16, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each governmental unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on prepetition claims against any of the REALM/ENCORE Debtors (the “**REALM/ENCORE Governmental Bar Date**” and, together with the REALM/ENCORE General Bar Date, the “**REALM/ENCORE Bar Dates**”).

The REALM/ENCORE Bar Date Order, the REALM/ENCORE Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the REALM/ENCORE Debtors (other than those set forth below as being specifically excluded) that arose prior to **October 9, 2009**, the date on which the REALM/ENCORE Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

The REALM/ENCORE Debtors were subsidiaries of General Motors Corporation. The properties owned by the REALM/ENCORE Debtors may have been known to you as property of General Motors Corporation.

If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the REALM/ENCORE Debtors or to share in any of the REALM/ENCORE Debtors’ estates if you have a claim that arose prior to **October 9, 2009**, including a 503(b)(9) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the REALM/ENCORE Debtors that occurred before **October 9, 2009** may give rise to claims against the REALM/ENCORE Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **October 9, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims.

2. WHO NEED NOT FILE A PROOF OF CLAIM

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schedules (as defined below) and (i) is **not** described in the Schedules as “disputed,” “contingent,” or “unliquidated,” (ii) you do **not** dispute the amount or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific REALM/ENCORE Debtor against which the claim is listed on the Schedules;
- (b) Your claim has been paid in full;
- (c) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; **provided, however, 503(b)(9) Claims are subject to the REALM/ENCORE General Bar Date as provided above.** Section 503(b)(9) provides in part: “...there shall be allowed administrative expenses...including...(9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” **Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the REALM/ENCORE General Bar Date;**
- (d) You hold a claim that has been allowed by an order of the Court entered on or before the applicable REALM/ENCORE Bar Date;

- (e) You hold a claim against any of the REALM/ENCORE Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (f) You are a REALM/ENCORE Debtor in these cases having a claim against another Debtor;
- (g) You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any REALM/ENCORE Debtor as of the REALM/ENCORE Bar Date; or
- (h) You hold a claim for which you have already properly filed a Proof of Claim against any of the REALM/ENCORE Debtors with the Clerk of the Court or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE REALM/ENCORE DEBTORS.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE REALM/ENCORE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable REALM/ENCORE Bar Date, and (ii) the date which is **thirty days** following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of October 9, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable REALM/ENCORE Bar Date unless an exception identified above applies.

4. WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be **actually received** on or before the applicable REALM/ENCORE Bar Date at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
P.O. Box 9386
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY
One Bowling Green
Room 534
New York, New York 10004

Proofs of Claim will be deemed timely filed only if **actually received** by The Garden City Group, Inc. or the Court on or before the applicable REALM/ENCORE Bar Date. Proofs of Claim may **not** be delivered by facsimile, telecopy, or electronic mail transmission.

5. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to the form provided with this Notice ("**Proof of Claim Form**") or Official Bankruptcy Form No. 10; (iv) state the REALM/ENCORE Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE REALM/ENCORE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH REALM/ENCORE DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC REALM/ENCORE DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT REALM/ENCORE DEBTOR'S BANKRUPTCY CASE. THE NAMES OF THE REALM/ENCORE DEBTORS AND THEIR CASE NUMBERS ARE SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at www.uscourts.gov/bkforms/ or www.motorsliquidation.com.

YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable REALM/ENCORE Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against each of the REALM/ENCORE Debtors, will be forever barred – that is, forbidden – from asserting the claim against each of the REALM/ENCORE Debtors and their respective estates (or filing a Proof of Claim with respect to the claim), and each of the REALM/ENCORE Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, participate in any distribution in any of the REALM/ENCORE Debtors' chapter 11 cases on account of the claim, or receive further notices with respect to any of the REALM/ENCORE Debtors' chapter 11 cases.

7. THE REALM/ENCORE DEBTORS' SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF

You may be listed as the holder of a claim against one or more of the REALM/ENCORE Debtors in the REALM/ENCORE Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the "Schedules"). If you rely on the REALM/ENCORE Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the REALM/ENCORE Debtors' Schedules, and if you do not dispute that your claim is only against the specified REALM/ENCORE Debtor, and if your claim is not described as "disputed", "contingent", or "unliquidated", you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable REALM/ENCORE Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court's electronic docket for the REALM/ENCORE Debtors' chapter 11 cases, which is posted on the Internet at www.motorsliquidation.com and www.nysb.uscourts.gov (a PACER login and password are required and can be obtained through the PACER Service Center at www.pacerpsc.uscourts.gov). Copies of the Schedules may also be examined by interested parties between the hours of 9:00 a.m. and 4:30 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York 10004. Copies of the REALM/ENCORE Debtors' Schedules may also be obtained by written request to the REALM/ENCORE Debtors' claims agent at the address and telephone number set forth below:

The Garden City Group, Inc.
Attn: Motors Liquidation Company
P.O. Box 9386
Dublin, Ohio 43017-4286
1-703-286-6401

In the event that the REALM/ENCORE Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, or (d) add a claim that was not listed on the Schedules, the REALM/ENCORE Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable REALM/ENCORE Bar Date and (b) the date that is **thirty days** after the REALM/ENCORE Debtors provide notice of the amendment.

A holder of a possible claim against the REALM/ENCORE Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.

DATED: December 2, 2009
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

EXHIBIT D

Realm/Encore Local Bar Date Notice

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU RESIDE NEAR ONE OF THE PROPERTIES LISTED AT THE END OF THIS NOTICE WHICH WAS FORMERLY OWNED BY GENERAL MOTORS.

THE DEBTORS ARE NOT AWARE OF ANY PARTICULAR HARM TO YOU OR YOUR PROPERTY AS A RESULT OF IT BEING LOCATED NEAR A GENERAL MOTORS PROPERTY OR ANY OTHER PARTICULAR REASON WHY YOU MAY HAVE A CLAIM. HOWEVER, IF YOU BELIEVE YOU HAVE A CLAIM, YOU SHOULD FILE A CLAIM ON OR BEFORE FEBRUARY 1, 2010 IN ACCORDANCE WITH THE PROCEDURES SET FORTH IN THIS NOTICE.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X-----
In re : Chapter 11 Case No.
:
MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)
f/k/a General Motors Corp., et al. :
:
Debtors. : (Jointly Administered)
:
-----X-----
In re : Chapter 11 Case No.
:
REMEDIATION AND LIABILITY : 09- 50029 (REG)
MANAGEMENT COMPANY, INC., :
:
Debtor. :
:
-----X-----
In re : Chapter 11 Case No.
:
ENVIRONMENTAL CORPORATE : 09-50030 (REG)
REMEDIATION COMPANY, INC., :
:
Debtor. :
:
-----X-----

NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Remediation and Liability Management Company, Inc. (subsidiary of General Motors Corporation)	09-50029 (REG)	38-2529430	Uptown Land Development Corporation
Environmental Corporate Remediation Company, Inc. (subsidiary of General Motors Corporation)	09-50030 (REG)	41-1650789	GM National Hawaii, Inc. NCRS Hawaii, Inc.

PLEASE TAKE NOTICE THAT, on December 2, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) having jurisdiction over the chapter 11 cases of Remediation and Liability Management Company, Inc. and Environmental Corporate Remediation Company, Inc., as debtors in possession (each subsidiaries of **General Motors Corporation**) (collectively, the “**REALM/ENCORE Debtors**”) entered an order (the “**Bar Date Order**”) establishing **February 1, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims against any of the REALM/ENCORE Debtors (the “**Bar Date**”).

The Bar Date Order, the Bar Date and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the REALM/ENCORE Debtors that arose prior to **October 9, 2009**, the date on which the REALM/ENCORE Debtors commenced their cases under chapter 11 of the United States Bankruptcy Code (the “**Bankruptcy Code**”).

The REALM/ENCORE Debtors were subsidiaries of GENERAL MOTORS CORPORATION. The properties owned by the REALM/ENCORE Debtors may have been known to you as property of General Motors Corporation.

If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the REALM/ENCORE Debtors or to share in any of the REALM/ENCORE Debtors’ estates if you have a claim that arose prior to **October 9, 2009**. Acts or omissions that occurred before **October 9, 2009** may give rise to claims against the REALM/ENCORE Debtors that must be filed by **February 1, 2010**, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **October 9, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

2. WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be actually received on or before **February 1, 2010** at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims Processing
P.O. Box 9386
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY
One Bowling Green
Room 534
New York, New York 10004

Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before **February 1, 2010**. Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

3. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in dollars; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the REALM/ENCORE Debtor against which it is filed; (v) set forth the factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

Additional Proof of Claim Forms may be obtained at www.uscourts.gov/bkforms/ or www.motorsliquidation.com.

YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

4. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

If you do not file a Proof of Claim on or before February 1, 2010 in the appropriate form in accordance with the procedures described in this Notice for any claim you wish to assert, you will be forever prohibited and forbidden from asserting the claim in the future, and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from and will not be liable or responsible for anything relating to the claim, and you will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, receive any distribution in any of the REALM/ENCORE Debtors' chapter 11 cases on account of your claim, or receive further notices with respect to any of the REALM/ENCORE Debtors' chapter 11 cases.

A holder of a possible claim should consult an attorney as to whether the holder should file a Proof of Claim.

DATED: December 2, 2009
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

LIST OF PROPERTIES

Site Name	Address	City, State Zip
6560 CASS AVENUE (NEW CENTER COMPLEX)	6560 CASS AVENUE	DETROIT, MICHIGAN 48202
BAY CITY- CROTTY STREET	1001 WOODSIDE AVENUE	BAY CITY, MICHIGAN 48708
DANVILLE CENTRAL FOUNDRY LANDFILL	I-74 @ G STREET	DANVILLE, ILLINOIS 61832
DELPHI I - COLDWATER ROAD (LANDFILL & WWTP CLOSURE)	WWTP AT 6220 HORTON STREET, LANDFILL AT 1245 EAST	FLINT, MICHIGAN 48505
DELPHI SAGINAW PLANT 2 - LANDFILL	79 WEST CENTER STREET	SAGINAW, MICHIGAN 48605
ELYRIA LANDFILL (LORAIN)	1400 LOWELL STREET	ELYRIA, OHIO 44035
FORMER DELCO CHASSIS PLANT	12950 ECKLES ROAD	LIVONIA, MICHIGAN 48150
GMPT - TOLEDO REALM PARCEL	1455 WEST ALEXIS ROAD	TOLEDO, OHIO 43612
GREENPOINT LANDFILL	77, 79 WEST CENTER STREET AND 3305, 3307 GABRIEL	SAGINAW, MICHIGAN 48602
LEEDS ASSEMBLY LAND	LAND SOUTH OF 6817 STADIUM DRIVE	KANSAS CITY, MISSOURI 64129
LEY CREEK SITE (SALINA)	FACTORY AVENUE AND/OR MALLOY ROAD EAST	SALINA, NEW YORK 13209
LINDEN ROAD	1200 SOUTH LINDEN ROAD	FLINT TOWNSHIP, MICHIGAN 48532
PEREGRINE - COLDWATER ROAD (PLANT)	1245 EAST COLDWATER ROAD (G-1245 EAST COLDWATER ROAD)	FLINT, MICHIGAN 48505
SOUTH LAGOON (MORAINE COMPLEX)	3801 DRYDEN	MORAINE, OHIO 45439
SUMMERFIELD (LAND ALONG STANLY ROAD)	STANLEY ROAD	MT. MORRIS, MICHIGAN 48458
TEXTILE ROAD LAND	BUNTON & TEXTILE ROADS	YPSILANTI, MICHIGAN 48197
TONAWANDA LANDFILL	2520 KENMORE AVENUE	TONAWANDA, NEW YORK 14207
VACANT LAND SOUTH OF VAN BORN	5000 ECORSE ROAD	BELLEVILLE, MICHIGAN 48111

Site Name	Newspaper Name	Newspaper Address	Newspaper City, State, Zip
6560 CASS AVENUE (NEW CENTER COMPLEX)	DETROIT FREE PRESS	600 WEST FORT STREET	DETROIT, MICHIGAN 48226
BAY CITY- CROTTY STREET	BAY CITY TIMES	311 5TH STREET	BAY CITY, MICHIGAN 48708
DANVILLE CENTRAL FOUNDRY LANDFILL	COMMERCIAL NEWS	17 WEST NORTH STREET	DANVILLE, ILLINOIS 61832
DELPHI I - COLDWATER ROAD (LANDFILL & WWTP CLOSURE)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
DELPHI SAGINAW PLANT 2 - LANDFILL	SAGINAW NEWS	203 SOUTH WASHINGTON AVENUE	SAGINAW, MICHIGAN 48607
ELYRIA LANDFILL (LORAIN)	THE CHRONICLE-TELEGRAM	225 EAST AVENUE	ELYRIA, OHIO 44035
FORMER DELCO CHASSIS PLANT	OBSERVER & ECCENTRIC	36251 SCHOOLCRAFT ROAD LIVONIA, MICHIGAN 48150	
GMPT - TOLEDO REALM PARCEL	THE TOLEDO BLADE	541 NORTH SUPERIOR STREET	TOLEDO, OHIO 43601
GREENPOINT LANDFILL	SAGINAW NEWS	203 SOUTH WASHINGTON AVENUE	SAGINAW, MICHIGAN 48607
LEEDS ASSEMBLY LAND	KANSAS CITY BUSINESS JOURNAL	1100 MAIN STREET	KANSAS CITY, KANSAS 64105
LEY CREEK SITE (SALINA)	SYRACUSE NEW TIMES	1415 WEST GENESEE STREET	SYRACUSE, NEW YORK 13204
LINDEN ROAD	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
PEREGRINE - COLDWATER ROAD (PLANT)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
SOUTH LAGOON (MORAINE COMPLEX)	DAYTON DAILY NEWS	45 SOUTH LUDLOW STREET DAYTON, OHIO 45402	
SUMMERFIELD (LAND ALONG STANLEY ROAD)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
TEXTILE ROAD LAND	YPSILANTI COURIER	133 WEST MICHIGAN AVENUE	YPSILANTI, MICHIGAN 48197
TONAWANDA LANDFILL	TONAWANDA NEWS	435 RIVER ROAD	NORTH TONAWANDA, NEW YORK 14120
VACANT LAND SOUTH OF VAN BORN	THE NEWS-HERALD	1 HERITAGE DRIVE # 100	SOUTHGATE, MICHIGAN 48195

EXHIBIT E

Property Bar Date Notice

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU RESIDE NEAR ONE OF THE PROPERTIES LISTED AT THE END OF THIS NOTICE WHICH WAS FORMERLY OWNED BY GENERAL MOTORS OR ONE OF ITS AFFILIATED COMPANIES AND CURRENTLY IS OWNED BY ONE OF THE DEBTORS.

THE DEBTORS ARE NOT AWARE OF ANY PARTICULAR HARM TO YOU OR YOUR PROPERTY AS A RESULT OF IT BEING LOCATED NEAR ONE OF THE PROPERTIES LISTED BELOW OR ANY OTHER PARTICULAR REASON WHY YOU MAY HAVE A CLAIM. HOWEVER, IF YOU BELIEVE YOU HAVE A CLAIM, YOU SHOULD FILE A CLAIM ON OR BEFORE FEBRUARY 10, 2010 IN ACCORDANCE WITH THE PROCEDURES SET FORTH IN THIS NOTICE.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X-----
In re : **Chapter 11 Case No.**
MOTORS LIQUIDATION COMPANY : **09-50026 (REG)**
f/k/a GENERAL MOTORS CORPORATION, :
***et al.*,** :
Debtors. : **(Jointly Administered)**
-----X-----

NOTICE OF DEADLINE FOR FILING CERTAIN PROOFS OF CLAIM

**TO ALL PERSONS AND ENTITIES WITH
CLAIMS AGAINST A DEBTOR SET FORTH BELOW:**

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Motors Liquidation Company (f/k/a General Motors Corporation)	09-50026	38-0572515	General Motors Corporation GMC Truck Division NAO Fleet Operations GM Corporation GM Corporation-GM Auction Department National Car Rental National Car Sales Automotive Market Research
MLCS, LLC (f/k/a Saturn, LLC)	09-50027	38-2577506	Saturn, LLC Saturn Corporation Saturn Motor Car Corporation GM Saturn Corporation Saturn Corporation of Delaware
MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation)	09-50028	38-2755764	Saturn Distribution Corporation

PLEASE TAKE NOTICE THAT, on December 18, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) having jurisdiction over the chapter 11 cases of Motors Liquidation Company (f/k/a **General Motors Corporation**) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) entered a supplemental order (the “**Supplemental Bar Date Order**”) establishing (i) **February 10, 2010, at 5:00 p.m. (Eastern Time)** (the “**Property Claims Bar Date**”) as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim based on prepetition claims against any of the Debtors with respect to their person or real property arising from being located adjacent to, or in the proximity of, the properties listed at the end of this notice (a “**Property Proof of Claim**”).

The Supplemental Bar Date Order, the Property Claims Bar Date and the procedures set forth below for the filing of Property Proofs of Claim apply to all such claims against the Debtors that arose prior to **June 1, 2009**, the date on which the Debtors commenced their cases under the United States Bankruptcy Code (the “**Bankruptcy Code**”).

If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROPERTY PROOF OF CLAIM.

1. WHO MUST FILE A PROPERTY PROOF OF CLAIM

You **MUST** file a **Property Proof of Claim** to vote on a chapter 11 plan filed by the Debtors or to share in any of the Debtors’ estates if you have a claim that arose prior to **June 1, 2009**. Acts or omissions of the Debtors that occurred before **June 1, 2009** may give rise to claims against the Debtors that must be filed by **February 10, 2010**, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **June 1, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

YOU SHOULD NOT FILE A PROPERTY PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

2. WHEN AND WHERE TO FILE

All Property Proofs of Claim must be filed so as to be actually received on or before February 10, 2010 at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company Claims
Processing
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.
Attn: Motors Liquidation Company
P.O. Box 9386
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY
One Bowling Green
Room 534
New York, New York 10004

Property Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before February 10, 2010. Property Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

3. WHAT TO FILE

If you file a Property Proof of Claim, your filed Property Proof of Claim must: (i) be written in the English language; (ii) be denominated in dollars; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR, SEPARATE PROPERTY PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROPERTY PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR’S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

Additional Property Proof of Claim Forms may be obtained at www.uscourts.gov/bkforms/ or www.motorsliquidationdocket.com.

YOU SHOULD ATTACH TO YOUR COMPLETED PROPERTY PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

4. CONSEQUENCES OF FAILURE TO FILE A PROPERTY PROOF OF CLAIM BY THE PROPERTY CLAIMS BAR DATE

If you do not file a Property Proof of Claim on or before February 10, 2010 in the appropriate form in accordance with the procedures described in this Notice for any such claim you wish to assert against each of the Debtors, you will be forever prohibited and forbidden from asserting the claim in the future, and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from and will not be liable or responsible for anything related to the claim and you will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, receive any distribution in any of the Debtors' chapter 11 cases on account of your claim, or receive further notices with respect to any of the Debtors' chapter 11 cases.

A holder of a possible claim against the Debtors should consult an attorney as to whether the holder should file a Property Proof of Claim.

DATED: December 18, 2009
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

LIST OF PROPERTIES

Site Name	Address	City, State Zip
BUICK CITY	902 EAST HAMILTON AVENUE	FLINT, MICHIGAN 48550
FIERO SITE	900 BALDWIN AVENUE	PONTIAC, MICHIGAN 48340
FLINT FLOWTHROUGH WAREHOUSE	4002 JAMES COLE BOULEVARD	FLINT, MICHIGAN 48503
GMPT - FREDERICKSBURG	11032 TIDEWATER TRAIL	FREDERICKSBURG, VIRGINIA 22408
GMPT - LIVONIA	12200 MIDDLEBELT	LIVONIA, MICHIGAN 48150
GMPT - PARMA COMPLEX	5400 CHEVROLET BOULEVARD PO BOX 30098	PARMA, OHIO 44130
GMPT - WILLOW RUN	2930 ECORSE ROAD	YPSILANTI, MICHIGAN 48198
GMVM - MORAINES ASSEMBLY	2601 WEST STROOP ROAD	MORAINE, OHIO 45439
GMVM - PONTIAC ASSEMBLY	2100 SOUTH OPDYKE ROAD	PONTIAC, MICHIGAN 48341
GMVM - WILMINGTON ASSEMBLY	801 BOXWOOD ROAD PO BOX 1512 - 19899	WILMINGTON, DELAWARE 19804
PCC-VALIDATION	200 SOUTH BOULEVARD WEST	PONTIAC, MICHIGAN 48341
SAGINAW NODULAR IRON	2100 VETERANS MEMORIAL PARKWAY	SAGINAW, MICHIGAN 48605
SHREVEPORT PLANT (GMVM & STAMPING)	7600 GENERAL MOTORS BOULEVARD PO BOX 30011 - 71130-0011	SHREVEPORT, LOUISIANA 71130
STAMPING - GRAND RAPIDS	300 36TH STREET SOUTHWEST	WYOMING, MICHIGAN 49548
STAMPING - INDIANAPOLIS	340 WHITE RIVER PARKWAY WEST DRIVE SOUTH 50	INDIANAPOLIS, INDIANA 46206
STAMPING - MANSFIELD	2525 WEST FOURTH STREET PO BOX 2567 - 44906	MANSFIELD, OHIO 44906
STAMPING - PITTSBURGH	1451 LEBANON SCHOOL ROAD	WEST MIFFLIN, PENNSYLVANIA 15122
STAMPING - PONTIAC NORTH CAMPUS	220 EAST COLUMBIA	PONTIAC, MICHIGAN 48340

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, et al., : **09-50026 (REG)**
f/k/a General Motors Corp., et al. :
: :
Debtors. : **(Jointly Administered)**
: :
-----x

**ORDER GRANTING DEBTORS' NINETIETH OMNIBUS
OBJECTION TO CLAIMS AND ENFORCEMENT OF BAR DATE ORDERS**
(Late-Filed Claims)

Upon the ninetieth omnibus objection to expunge certain claims and motion requesting enforcement of Bar Date Orders,¹ dated September 17, 2010 (the “**Ninetieth Omnibus Objection to Claims**”), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order disallowing and expunging the Late-Filed Claims on the grounds that such claims were not timely filed, all as more fully described in the Ninetieth Omnibus Objection to Claims; and due and proper notice of the Ninetieth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Ninetieth Omnibus Objection to Claims is in the best

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Ninetieth Omnibus Objection to Claims.

interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Ninetieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Ninetieth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit “A”** (the “**Order Exhibit**”) annexed hereto under the heading “*Claims to be Disallowed and Expunged*” are disallowed and expunged; and it is further

ORDERED that, if applicable, the Ninetieth Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the Ninetieth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the Ninetieth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the

validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to any claim listed on Exhibit "A" annexed to the Ninetieth Omnibus Objection to Claims under the heading "*Claims to be Disallowed and Expunged*" that is not listed on the Order Exhibit annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2010

United States Bankruptcy Judge